

**EDDIE JEAN CARR**  
CHANCERY CLERK  
P. O. Box 686  
Jackson, Mississippi 39205-0686

**CLERK'S CERTIFICATE**

**THE STATE OF MISSISSIPPI  
COUNTY OF HINDS**

I, Eddie Jean Carr, Clerk of the Chancery Court of Hinds County, Mississippi, the same being a court of record, do hereby certify that the foregoing 16 pages are true, full and complete copies of all papers filed herein in Cause Number 6209. 508 styled:

" Patricia Melonice Wise Green vs  
United States Department of Veterans Affairs

as the same are and remain on file and of record in my office.

In witness whereof, I hereto set my hand and official seal of said court, at my office, in the City of Jackson, County of Hinds, State of Mississippi, this the 7 day of May, 20 19.



**EDDIE JEAN CARR, Chancery Clerk**

By: [Signature], D.C.

|  |  |   |  |  |  |  |  |
|--|--|---|--|--|--|--|--|
| <b>COVER SHEET</b><br><b>Civil Case Filing Form</b><br>(To be completed by Attorney/Party<br>Prior to Filing of Pleading)  |  | Court Identification Docket #<br><div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">25</div> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">CH</div> </div> <div style="display: flex; justify-content: space-around;"> <div>County #</div> <div>Judicial District</div> <div>Court ID (CH, CI, CO)</div> </div> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">04</div> <div style="border: 1px solid black; padding: 2px;">22</div> <div style="border: 1px solid black; padding: 2px;">19</div> </div> <div style="display: flex; justify-content: space-around;"> <div>Month</div> <div>Date</div> <div>Year</div> </div>  |  | Filed: 04/22/2019<br>Case Year<br><div style="border: 1px solid black; padding: 2px;">2019</div>   |  | Page 1 of 1<br>Docket Number<br><div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">508</div> </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">31</div> Local Docket ID |  |
| Mississippi Supreme Court<br>Administrative Office of Courts   |  | Form AOC/01<br>(Rev 2016)   |  | Case Number if filed prior to 1/1/94   |  |  |  |
| In the <u>CHANCERY</u> Court of <u>HINDS</u> County - <u>FIRST</u> Judicial District   |  |   |  |  |  |  |  |
| <b>Origin of Suit (Place an "X" in one box only)</b><br><div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input checked="" type="checkbox"/> Initial Filing</div> <div style="width: 50%;"><input type="checkbox"/> Reinstated</div> <div style="width: 50%;"><input type="checkbox"/> Foreign Judgment Enrolled</div> <div style="width: 50%;"><input type="checkbox"/> Transfer from Other court</div> <div style="width: 50%;"><input type="checkbox"/> Remanded</div> <div style="width: 50%;"><input type="checkbox"/> Reopened</div> <div style="width: 50%;"><input type="checkbox"/> Joining Suit/Action</div> <div style="width: 50%;"><input type="checkbox"/> Appeal</div> <div style="width: 50%;"><input type="checkbox"/> Other</div> </div>   |  |   |  |  |  |  |  |
| <b>Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form</b><br>Individual <u>Wise (Green)</u> <u>Patricia Melonee</u><br><div style="display: flex; justify-content: space-between;"> <div>           Last Name<br/>           First Name<br/>           Maiden Name, if applicable         </div> <div>           M.I.<br/>           Jr/Sr/III/IV         </div> </div> <div> <input type="checkbox"/> Check ( x ) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____<br/> <input type="checkbox"/> Check ( x ) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____       </div> |  |   |  |  |  |  |  |
| Business _____<br>Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated<br><input type="checkbox"/> Check ( x ) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____  |  |   |  |  |  |  |  |
| Address of Plaintiff <u>679 Kearney Park Road, Flora, MS 39071</u>   |  |   |  |  |  |  |  |
| Attorney (Name & Address) <u>Dennis L. Horn, Horn &amp; Payne, PLLC, PO Box 2754, Madison, MS 39130-2754</u> MS Bar No. <u>2645</u><br><input type="checkbox"/> Check ( x ) if Individual Filing Initial Pleading is NOT an attorney<br>Signature of Individual Filing: <u>Dennis L. Horn</u>  |  |   |  |  |  |  |  |
| <b>Defendant - Name of Defendant - Enter Additional Defendants on Separate Form</b><br>Individual _____<br><div style="display: flex; justify-content: space-between;"> <div>           Last Name<br/>           First Name<br/>           Maiden Name, if applicable         </div> <div>           M.I.<br/>           Jr/Sr/III/IV         </div> </div> <div> <input type="checkbox"/> Check ( x ) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____<br/> <input type="checkbox"/> Check ( x ) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____       </div>  |  |   |  |  |  |  |  |
| Business <u>United States Department of Veterans Affairs</u><br>Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated<br><input type="checkbox"/> Check ( x ) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____   |  |   |  |  |  |  |  |
| Attorney (Name & Address) - If Known _____ MS Bar No. _____  |  |   |  |  |  |  |  |
| <input type="checkbox"/> Check ( x ) if child support is contemplated as an issue in this suit.*<br>*If checked, please submit completed Child Support Information Sheet with this Cover Sheet   |  |   |  |  |  |  |  |
| <b>Nature of Suit (Place an "X" in one box only)</b>   |  |   |  |  |  |  |  |
| <b>Domestic Relations</b><br><input type="checkbox"/> Child Custody/Visitation<br><input type="checkbox"/> Child Support<br><input type="checkbox"/> Contempt<br><input type="checkbox"/> Divorce: Fault<br><input type="checkbox"/> Divorce: Irreconcilable Diff.<br><input type="checkbox"/> Domestic Abuse<br><input type="checkbox"/> Emancipation<br><input type="checkbox"/> Modification<br><input type="checkbox"/> Paternity<br><input type="checkbox"/> Property Division<br><input type="checkbox"/> Separate Maintenance<br><input type="checkbox"/> Term. of Parental Rights-Chancery<br><input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA)<br><input type="checkbox"/> Other _____  |  | <b>Business/Commercial</b><br><input type="checkbox"/> Accounting (Business)<br><input type="checkbox"/> Business Dissolution<br><input type="checkbox"/> Debt Collection<br><input type="checkbox"/> Employment<br><input type="checkbox"/> Foreign Judgment<br><input type="checkbox"/> Garnishment<br><input type="checkbox"/> Replevin<br><input type="checkbox"/> Other _____<br><b>Probate</b><br><input type="checkbox"/> Accounting (Probate)<br><input type="checkbox"/> Birth Certificate Correction<br><input type="checkbox"/> Mental Health Commitment<br><input type="checkbox"/> Conservatorship<br><input type="checkbox"/> Guardianship<br><input type="checkbox"/> Heirship<br><input type="checkbox"/> Intestate Estate<br><input type="checkbox"/> Minor's Settlement<br><input type="checkbox"/> Muniment of Title<br><input type="checkbox"/> Name Change<br><input type="checkbox"/> Testate Estate<br><input type="checkbox"/> Will Contest<br><input type="checkbox"/> Alcohol/Drug Commitment (Involuntary)   |  | <input type="checkbox"/> Alcohol/Drug Commitment (Involuntary)<br><input type="checkbox"/> Other _____<br><b>Children/Minors - Non-Domestic</b><br><input type="checkbox"/> Adoption - Contested<br><input type="checkbox"/> Adoption - Uncontested<br><input type="checkbox"/> Consent to Abortion<br><input type="checkbox"/> Minor Removal of Minority<br><input type="checkbox"/> Other _____<br><b>Civil Rights</b><br><input type="checkbox"/> Elections<br><input type="checkbox"/> Expungement<br><input type="checkbox"/> Habeas Corpus<br><input type="checkbox"/> Post Conviction Relief/Prisoner<br><input type="checkbox"/> Other _____<br><b>Contract</b><br><input type="checkbox"/> Breach of Contract<br><input type="checkbox"/> Installment Contract<br><input type="checkbox"/> Insurance<br><input type="checkbox"/> Specific Performance<br><input type="checkbox"/> Other _____<br><b>Statutes/Rules</b><br><input type="checkbox"/> Bond Validation<br><input type="checkbox"/> Civil Forfeiture<br><input type="checkbox"/> Declaratory Judgment<br><input type="checkbox"/> Injunction or Restraining Order<br><input checked="" type="checkbox"/> Other <u>Accounting &amp; Discv</u> |  |  |  |
| <b>Appeals</b><br><input type="checkbox"/> Administrative Agency<br><input type="checkbox"/> County Court<br><input type="checkbox"/> Hardship Petition (Driver License)<br><input type="checkbox"/> Justice Court<br><input type="checkbox"/> MS Dept Employment Security<br><input type="checkbox"/> Municipal Court<br><input type="checkbox"/> Other _____   |  | <b>Real Property</b><br><input type="checkbox"/> Adverse Possession<br><input type="checkbox"/> Ejectment<br><input type="checkbox"/> Eminent Domain<br><input type="checkbox"/> Eviction<br><input type="checkbox"/> Judicial Foreclosure<br><input type="checkbox"/> Lien Assertion<br><input type="checkbox"/> Partition<br><input type="checkbox"/> Tax Sale: Confirm/Cancel<br><input type="checkbox"/> Title Boundary or Easement<br><input type="checkbox"/> Other _____<br><b>Torts</b><br><input type="checkbox"/> Bad Faith<br><input type="checkbox"/> Fraud<br><input type="checkbox"/> Intentional Tort<br><input type="checkbox"/> Loss of Consortium<br><input type="checkbox"/> Malpractice - Legal<br><input type="checkbox"/> Malpractice - Medical<br><input type="checkbox"/> Mass Tort<br><input type="checkbox"/> Negligence - General<br><input type="checkbox"/> Negligence - Motor Vehicle<br><input type="checkbox"/> Premises Liability<br><input type="checkbox"/> Product Liability<br><input type="checkbox"/> Subrogation<br><input type="checkbox"/> Wrongful Death<br><input type="checkbox"/> Other _____ |  |  |  |  |  |

IN THE CHANCERY COURT OF THE FIRST JUDICIAL DISTRICT OF  
HINDS COUNTY, MISSISSIPPI

PATRICIA MELONEE WISE (GREEN)

PLAINTIFF

VS.

UNITED STATES DEPARTMENT OF  
VETERANS AFFAIRS

**FILED**

APR 22 2019

EDDIE JEAN CARR, CHANCERY CLERK

*[Signature]*

CAUSE NO. 2019-508 6/2

DEFENDANT

COMPLAINT FOR AN ACCOUNTING AND DISCOVERY

COMES NOW the Plaintiff, Patricia Melonee Wise (Green), by and through counsel, and files this her Complaint for an Accounting and Discovery against the United States Department of Veterans Affairs, Defendant herein, and as grounds therefor would show the following:

1.

Plaintiff Patricia Melonee Wise (Green) is an adult resident citizen of Madison County, Mississippi, whose address is 679 Kearney Park Road, Flora, Mississippi 39071.

2.

Defendant United States Department of Veterans Affairs, located at 1500 Woodrow Wilson Blvd., Jackson, Mississippi 39216, may be served with process by and through its Secretary, Robert Wilkie, United States Department of Veterans Affairs, 210 Vermont Ave., NW, Washington, DC 20420, who is responsible for the nationwide system of health care services, including the G. V. (Sonny) Montgomery VA Medical Center located in Jackson, Mississippi.

3.

Plaintiff was employed with the Defendant as a telephone advice pharmacist. In September of 2015, Plaintiff began medical leave, using her own personal leave. On December 28, 2015, Plaintiff converted the medical leave to leave without pay status.

4.

The Defendant has manually altered Plaintiff's personnel file with entries which are not accurate, including Workers' Compensation records.

5.

This Complaint for discovery is necessary to compel the Defendant to produce documentation necessary for the Plaintiff to be able to correct her personnel file and other improper entries or submittals in that file. This personnel recording system is referred to as an Electronic Official Personnel Folder (eOPF). The eOPF is an electronic version of Plaintiff's official personnel folder and contains all the official records required to document her Federal career. These incorrect entries have impacted both payroll and personnel records.

6.

Manual copies of Plaintiff's employment with the Defendant also should appear separately in the Hospital's Department of Human Resources.

7.

Plaintiff is entitled to discovery and an accounting of her employment history with the Defendant as demonstrated by the Electronic Official Personnel Folder [eOPF] file, the payroll file, and any manual documents which reside with the Department of Human Resources or the Hospital.

8.

As such, Plaintiff is entitled to the following documents:

- (1) All corrected W-2 tax forms for both 2017 and 2018 showing no income.
- (2) All SF-50 Notification of Personnel Actions submitted to the Defense Finance and Accounting Service (DFAS) since September 22, 2015. This request includes, but is not limited to, the SF-50 Code 001 Cancellation of Suspension Charge that was submitted on September 19, 2018; the SF-50 Code 001 Cancellation of return-to-duty that was submitted on September 19, 2018; and the SF-50 Code 001 Cancellation of the return-to-duty 2018 that was submitted on September 15, 2018, along with any and all other submittals made during September of 2018.
- (3) Documentation reflecting the current status of all submitted SF-50 Notifications of Personnel Action, including whether the actions are active, pending, or have been cancelled.
- (4) Copies of all SF-52's Request for Personnel Action, since September of 2015. All SF-52's should include the stamped date indicating when these forms actually were received by Defendant's Department of Human Resources.
- (5) Copy of the SF-50 Transfer of Enrollment to Workers' Compensation as was instructed by the Department of Labor on November 2, 2016, reflecting the beginning claim date of March 15, 2016.
- (6) The updated SF-50 Notification, reflecting approval of Plaintiff's Workers' Compensation retroactive to September 22, 2015, with the new beginning claim date of December 28, 2015.
- (7) Copies of the Plaintiff's Time and Leave (T&L) statements for the pay periods ending on January 21, 2017 and on May 26, 2018.

(8) Copies of all filed T&L reports, bookkeeper records, and Human Resource submittals that were involved in the creation of initial debt on February 6, 2016. Also, provide any and all documentation authorizing these actions. These records include the time and date stamped SF-52 Return to Duty and SF-52 Suspension Charge.

(9) Copies of all filed T&L reports, bookkeeper records, and Human Resource submittals that relate to Plaintiff's separation on October 2, 2018, as well as documentation reflecting who authorized this action.

(10) Copies of all remedy tickets submitted to Defense Finance and Accounting Service (DFAS) from and after September 22, 2015.

(11) All records reflecting the current status of the remedy tickets requested in (10), including records of whether these tickets are active or closed, any and all DFAS's recommendations and the actual actions taken, and a listing of all remedy tickets that were automatically closed without the completion of the DFAS recommendations.

(12) Copies of all generated indebtedness letters levied against Plaintiff from and after September 22, 2015. Specify the purpose and time frame involved for each debt. Include documentation indicating whether the status of each debt is currently active, was paid by Plaintiff, or was invalidated.

(13) A written declaration of any other debt(s) generated that the Defendant is currently hold against the Plaintiff, including any outstanding debts for healthcare premiums. Include the reason for each debt and the debt status.

(14) Written confirmation that Plaintiff is still owed 41.75 hours of leave for pay period ending on December 26, 2015, along with a T&L statement between December 21, 2015 through December 26, 2015 posted as Administrative Leave.

(15) Copy of a computer generated screen shot ("print screen") of Plaintiff's eOPF showing all posted entries after September 22, 2015.

(16) Copies of Plaintiff's 2016, 2017, and 2018 Performance Evaluations, indicating that Plaintiff had been on medical leave since September 23, 2015.

(17) Documentation confirming that Plaintiff's leave status correctly reflects Leave Without Pay – Workers' Compensation, since December 28, 2015. This includes a complete Time and Leave (T&L) generated report reflecting these corrections.

(18) Any and all hard copies of records of Plaintiff currently maintained in the Department of Human Resources.

(19) A copy of any and all records reflecting the 2010 denial of Reasonable Accommodation, along with the Minutes that led to the decision to deny, and all documents reflecting who was present at the meeting. Include a copy of the required VA Form 0857G.

(20) Documents reflecting how many hours of personal leave Plaintiff was charged following the approval of her Workers' Compensation claim on November 17, 2010 until she was provided the accommodations on May 11, 2011.

(21) A Time and Leave (T&L) report of all of Plaintiff's scheduled night tour assignments between October 16, 2009 and October 15, 2010 (including those which were worked and which were taken as leave).

(22) Provide documentation indicating any tours assigned to Plaintiff between October 16, 2009 and October 15, 2010 that were not rotated with GS-12 specialist pharmacists or regularly assigned to one of the two GS-12 lead in-patient pharmacists. Include all tours that Plaintiff received pay at a GS-12 rate.

(23) Any documentation supporting that the Defendant had investigated the feasibility of telework for Plaintiff's 2011 Court settlement job description.

(24) Documentation demonstrating any permanent telework alternative position offered to Plaintiff that had met the requirements of Workers' Compensation, under the required guidelines of the Federal Employee Compensation Act (FECA).

(25) Provide any and all supportive evidence that on or around September 23, 2015, that Plaintiff's supervisor, Latrouna Tobias, had provided guidance and counseled Plaintiff of entitlements, rights, and responsibilities regarding the reoccurrence of her injury, as required per VHA Directive 1609, page E-8. This request includes the election of continuation of pay (COP) for lost time, along with the need for Plaintiff to file a Department of Labor (DOL) form CA-2a for the worsening of her injury.

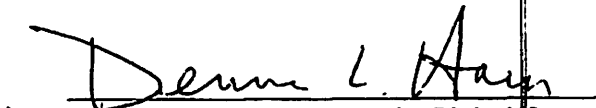
(26) Copies of any correspondence from Latronia Tobias to the Hospital's Workers' Compensation coordinator during September 2015 related to Plaintiff. Include any supportive documentation located in the Plaintiff's Workers' Compensation file, located in the Department of Human Resources.

(27) A copy of the required DOL form CA-3 electronically submitted by the Defendant to Workers' Compensation, along with the required medical documentation, to justify the submittal

of the SF-50 notifications using the legal authority of 5 CFR, Part 353: Restoration of Compensatory Injury.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that process issue and the Defendant United States Department of Veterans Affairs produce an account to Plaintiff for any and all documents and records identified in this Complaint for an Accounting and Discovery to be produced. Plaintiff also prays for general relief.

Respectfully submitted, this the 19<sup>th</sup> day of April, 2019.

  
Dennis L. Horn, Attorney for Plaintiff,  
Patricia Melonee Wise (Green)

Dennis L. Horn (MSB #2645)  
Shirley Payne (MSB #4071)  
HORN & PAYNE, PLLC  
P. O. Box 2754  
Madison, MS 39130-2754  
Phone: 601-853-6090  
FAX: 601-853-2878  
[hornpayne@gmail.com](mailto:hornpayne@gmail.com)

Case: 25CH1:19-cv-00508 Document #: 4 Filed: 04/22/2019 Page 1 of 3

IN THE CHANCERY COURT OF THE FIRST JUDICIAL DISTRICT OF  
HINDS COUNTY, MISSISSIPPI

PATRICIA MELONEE WISE (GREEN)

PLAINTIFF *g/b*

VS.

CAUSE NO. 62019-508

UNITED STATES DEPARTMENT OF  
VETERANS AFFAIRS

DEFENDANT

SUMMONS

THE STATE OF MISSISSIPPI

TO: Hon. Robert Wilkie, Secretary  
United States Department of Veterans Affairs  
810 Vermont Ave., NW  
Washington, DC 20420

**FILED**  
APR 22 2019

EDDIE JEAN CARR, CHANCERY CLERK

NOTICE TO DEFENDANT

THE COMPLAINT FOR AN ACCOUNTING AND DISCOVERY WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint for an Accounting and Discovery to Dennis L. Horn, the attorney for the Plaintiff, whose post office address is Post Office Box 2754, Madison, MS 39110, and whose street address is 1300 Highway 51, Madison, MS 39110. Your response must be mailed or delivered within (30) days from the date of delivery of this Summons and Complaint for an Accounting and Discovery or a judgment by default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this 22nd April day of April, 2019.



Dennis L. Horn (MSB #2645)  
Horn & Payne, PLLC  
P. O. Box 2754  
Madison, MS 39130-2754  
Phone: 601-853-6090  
Attorney for Plaintiff

EDDIE JEAN CARR, Chancery Clerk  
P. O. Box 686  
Jackson, MS 39205

By: *[Signature]*

Deputy Clerk

**PROOF OF SERVICE**  
(Process Server)

United States Department of Veterans Affairs  
by and through its Secretary, Robert Wilkie  
810 Vermont Ave., NW  
Washington, DC 20420

I, the undersigned process server, served the Summons and Complaint for an Accounting and Discovery upon the person or entity named above in the manner set forth below:

( ) I personally delivered a copy of the Summons and Complaint for an Accounting and Discovery on the \_\_\_\_\_ day of \_\_\_\_\_, 2019, to:

( ) I was unable to serve the Summons and Complaint for an Accounting and Discovery:  
This the \_\_\_\_\_ day of \_\_\_\_\_, 2019.

At the time of service I was at least 18 years of age and not a party to this action.

Name \_\_\_\_\_  
Address \_\_\_\_\_  
Tel. No. \_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF \_\_\_\_\_

Personally appeared before me the undersigned authority in and for the county and state aforesaid, the within named \_\_\_\_\_ who, being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing Proof of Service are true and correct as therein stated.

\_\_\_\_\_  
PROCESS SERVER

Sworn to and subscribed before me, this the \_\_\_\_\_ day of April, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

\_\_\_\_\_

PROOF OF SERVICE

This summons for Hon. Robert Wilkie, Secretary, United States Department of Veterans Affairs, was received by me on April \_\_\_\_\_, 2019.

I personally mailed by United States Mail, Certified Mail Receipt No. \_\_\_\_\_, Return Receipt Requested, the Summons and Complaint for an

Accounting and Discovery to:

Hon. Robert Wilkie, Secretary  
United States Department of Veterans Affairs  
810 Vermont Ave., NW  
Washington, DC 20420

The Return Receipt was returned, signed: " \_\_\_\_\_ " (see attached).

At the time of service I was at least 18 years of age and not a party to this action.

Name \_\_\_\_\_  
Address \_\_\_\_\_  
Tel. No. \_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF \_\_\_\_\_

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\_\_\_\_\_  
PROCESS SERVER

Sworn to and subscribed before me, this the \_\_\_\_\_ day of April, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

\_\_\_\_\_

Case: 25CH1:19-cv-00508 Document #: 5 Filed: 04/22/2019 Page 1 of 3

IN THE CHANCERY COURT OF THE FIRST JUDICIAL DISTRICT OF  
HINDS COUNTY, MISSISSIPPI

PATRICIA MELONEE WISE (GREEN)

PLAINTIFF 6/2

VS.

CAUSE NO. 62019-508

UNITED STATES DEPARTMENT OF  
VETERANS AFFAIRS

DEFENDANT

SUMMONS

THE STATE OF MISSISSIPPI

TO: Hon. William P. Barr, United States Attorney General  
United States Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530-0001

**FILED**  
APR 22 2019

EDDIE JEAN CARR, CHANCERY CLERK

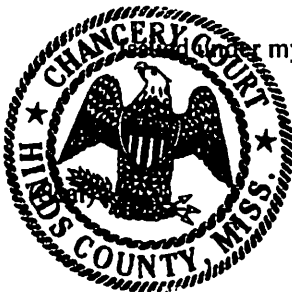
BY: [Signature] AC

NOTICE TO DEFENDANT

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You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.



Dennis L. Horn (MSB #2645)  
Horn & Payne, PLLC  
P. O. Box 2754  
Madison, MS 39130-2754  
Phone: 601-853-6090  
*Attorney for Plaintiff*

Given under my hand and the seal of said Court, this 22nd day of April, 2019.

EDDIE JEAN CARR, Chancery Clerk  
P. O. Box 686  
Jackson, MS 39205

By: [Signature]  
Deputy Clerk

**PROOF OF SERVICE**  
(Process Server)

Hon. William P. Barr, United States Attorney General  
United States Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530-0001

I, the undersigned process server, served the Summons and Complaint for an Accounting and Discovery upon the person or entity named above in the manner set forth below:

( ) I personally delivered a copy of the Summons and Complaint for an Accounting and Discovery on the \_\_\_\_\_ day of \_\_\_\_\_, 2019, to:

( ) I was unable to serve the Summons and Complaint for an Accounting and Discovery:

This the \_\_\_\_\_ day of \_\_\_\_\_, 2019.

At the time of service I was at least 18 years of age and not a party to this action.

Name \_\_\_\_\_  
Address \_\_\_\_\_  
Tel. No. \_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF \_\_\_\_\_

Personally appeared before me the undersigned authority in and for the county and state aforesaid, the within named \_\_\_\_\_ who, being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing Proof of Service are true and correct as therein stated.

\_\_\_\_\_  
PROCESS SERVER

Sworn to and subscribed before me, this the \_\_\_\_\_ day of April, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

\_\_\_\_\_

PROOF OF SERVICE

This summons for Hon. William P. Barr, United States Attorney General, United States Department of Justice, was received by me on April \_\_\_\_, 2019.

I personally mailed by United States Mail, Certified Mail Receipt No. \_\_\_\_\_, Return Receipt Requested, the Summons and Complaint for an Accounting and Discovery to:

Hon. William P. Barr, United States Attorney General  
United States Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530-0001

The Return Receipt was returned, signed: "\_\_\_\_\_" (see attached).

At the time of service I was at least 18 years of age and not a party to this action.

Name \_\_\_\_\_  
Address \_\_\_\_\_  
Tel. No. \_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF \_\_\_\_\_

Personally appeared before me the undersigned authority in and for the county and state aforesaid, the within named \_\_\_\_\_ who, being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing Proof of Service are true and correct as therein stated.

\_\_\_\_\_  
PROCESS SERVER

Sworn to and subscribed before me, this the \_\_\_\_\_ day of April, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:  
\_\_\_\_\_

Case: 25CH1:19-cv-00508 Document #: 6 Filed: 04/22/2019 Page 1 of 2

IN THE CHANCERY COURT OF THE FIRST JUDICIAL DISTRICT OF  
HINDS COUNTY, MISSISSIPPI

PATRICIA MELONEE WISE (GREEN)

PLAINTIFF 6/2

VS.

CAUSE NO. 6-2019-508

UNITED STATES DEPARTMENT OF  
VETERANS AFFAIRS

DEFENDANT

SUMMONS

THE STATE OF MISSISSIPPI

TO: Hon. D. Michael Hurst, Jr., United States Attorney for the  
Southern District of Mississippi  
501 East Court Street, Ste 4.430  
Jackson, MS 39201

**FILED**  
APR 22 2019  
EDDIE JEAN CARR, CHANCERY CLERK  
*[Signature]* R.C.

NOTICE TO DEFENDANT

THE COMPLAINT FOR AN ACCOUNTING AND DISCOVERY WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint for an Accounting and Discovery to Dennis L. Horn, the attorney for the Plaintiff, whose post office address is Post Office Box 2754, Madison, MS 39110, and whose street address is 1300 Highway 51, Madison, MS 39110. Your response must be mailed or delivered within (30) days from the date of delivery of this Summons and Complaint for an Accounting and Discovery or a judgment by default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this 22nd day of April, 2019.



Dennis L. Horn (MSB #2645)  
Horn & Payne, PLLC  
P. O. Box 2754  
Madison, MS 39130-2754  
Phone: 601-853-6090  
Attorney for Plaintiff

EDDIE JEAN CARR, Chancery Clerk  
P. O. Box 686  
Jackson, MS 39205

By *[Signature]*  
Deputy Clerk

**PROOF OF SERVICE**  
(Process Server)

Hon. D. Michael Hurst, Jr., United States Attorney for the  
Southern District of Mississippi  
501 East Court Street, Ste 4.430  
Jackson, MS 39201

I, the undersigned process server, served the Summons and Complaint for an Accounting and Discovery upon the person or entity named above in the manner set forth below:

( ) I personally delivered a copy of the Summons and Complaint for an Accounting and

Discovery on the \_\_\_\_\_ day of \_\_\_\_\_, 2019, to:

\_\_\_\_\_.

( ) I was unable to serve the Summons and Complaint for an Accounting and Discovery:

This the \_\_\_\_\_ day of \_\_\_\_\_, 2019.

At the time of service I was at least 18 years of age and not a party to this action.

Name \_\_\_\_\_  
Address \_\_\_\_\_  
Tel. No. \_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF \_\_\_\_\_

Personally appeared before me the undersigned authority in and for the county and state aforesaid, the within named \_\_\_\_\_ who, being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing Proof of Service are true and correct as therein stated.

\_\_\_\_\_  
PROCESS SERVER

Sworn to and subscribed before me, this the \_\_\_\_\_ day of April, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

\_\_\_\_\_